



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Northeast Regional Office • 205B Lowell Street, Wilmington MA 01887 • 978-694-3200

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Ms. Karen Brushett
Twin Rivers Technologies
Manufacturing Corporation
780 Washington Street
Quincy, MA 02169

October 1, 2015
RE: **QUINCY**
Transmittal No.: X264320
Application No.: NE-15-002
Class: OP
FMF No.: 230622
**AMENDED AIR QUALITY PLAN
APPROVAL**

Dear Ms. Brushett:

The Massachusetts Department of Environmental Protection ("MassDEP"), Bureau of Air & Waste, has reviewed your Non-major Comprehensive Plan Application ("Application") listed above. This Application concerns the proposed construction, substantial reconstruction, alteration and/or operation of a new Combined Heat and Power (CHP) cogeneration unit at your facility located at 780 Washington Street, Quincy, Massachusetts. The combustion turbine is subject to Environmental Results Program (ERP) for Engines and Turbine Regulation 310 CMR 7.26 (43). The heat recovery steam generating (HRSG) unit equipped with a natural gas fired duct burner (DB) is subject to Plan Approval Regulation 310 CMR 7.02.

ERM Consulting & Engineering, Inc. prepared this Application on behalf of Twin Rivers Technologies Manufacturing Corporation (TRT). The Application was received on January 26, 2015 and bears the seal and signature of Ms. Alicia R. Kabir, Massachusetts P.E. No. 46671. MassDEP received additional information to supplement the application on May 11, 2015, May 15, 2015, May 21, 2015, May 27, 2015, June 15, 2015, June 29, 2015, August 11, 2015, and September 2, 2015.

This Application was submitted in accordance with 310 CMR 7.02 Plan Approval and Emission Limitations as contained in 310 CMR 7.00 "Air Pollution Control" regulations adopted by MassDEP pursuant to the authority granted by Massachusetts General Laws, Chapter 111, Section 142 A-N, Chapter 21C, Section 4 and 6, and Chapter 21E, Section 6. MassDEP's review of your Application has been limited to air pollution control regulation compliance and does not relieve you of the obligation to comply with any other regulatory requirements.

MassDEP has determined that the Application is administratively and technically complete and that the Application is in conformance with current Air Pollution Control regulations and current air

pollution control engineering practice, and hereby grants this **Plan Approval** for said Application, as submitted, subject to the conditions listed below.

Please review the entire Plan Approval carefully, as it stipulates the particular conditions with which the facility owner/operator must comply in order for the facility to be operated in compliance with the Regulations.

1. BACKGROUND AND DESCRIPTION OF FACILITY

TRT owns and operates an oleo chemical processing facility located at 780 Washington Street in Quincy which operates under Air Quality Operating Permit MBR-95-OPP-056MM1. TRT proposes to install and operate a natural gas fired Opra, Model OP16-3B combustion turbine (EU5) that will comply with the requirements of the MassDEP Environmental Results Program (ERP) for Engines and Turbines via 310 CMR 7.26(43). TRT proposes to install and operate a HRSG equipped with a natural gas fired DB, as part of the CHP Cogeneration Project. TRT is a major source of air emissions and is subject to the Operating Permit program pursuant to 310 CMR 7.00: Appendix C. As such, TRT is required by regulation to submit a plan application for the 36 million British thermal units per hour (mmBtu/hr) natural gas fired duct burner (DB) and HRSG (EU6). Boiler ERP Regulation 310 CMR 7.26(30) does not apply to the installation and operation of boilers (DB/HRSG) at Operating Permit sources (major sources).

The proposed EU5 will be accompanied by HRSG/DB unit (EU6). The system at 100% turbine load with duct firing will produce a nominal 2.0 megawatts (MWs) of electricity at ISO conditions and 40,000 pounds of 800 pounds per square inch gauge (psig) steam. EU5 will be fired exclusively by natural gas. EU6 will exclusively use natural gas to provide additional steam if needed. The EU5/EU6 train will be controlled with selective catalytic reduction (SCR) for nitrogen oxide (NO_x) control and an oxidation catalyst for carbon monoxide/volatile organic compound (CO/VOC) control. Continuous emission monitors (CEMS) will be used to measure and record NO_x, CO, and ammonia (NH₃) slip emissions from EU5/EU6. EU5 will meet the emission limitations and other associated requirements of the ERP for turbines at 310 CMR 7.26(43).

The existing facility configuration consists of three, multi-fuel boilers, Boiler No. 1 (EU1), Boiler No. 2 (EU2) and Boiler No. 3 (EU3). EU1 and EU2 combust natural gas as the primary fuel of use or 0.1 weight % natural oil by-products (NOB), 0.3 weight % sulfur distillate fuel oil, and 1.0 weight % sulfur residual fuel oil as the secondary fuel options. EU3 combusts natural gas as the primary fuel of use or 0.0015 weight % sulfur ultra-low distillate oil, and NOB as the secondary fuel options. NOB is an approved, in-house mixture of various vegetable oils/fats fuel product.

Exhaust gases from EU1 and EU2 are emitted through a single 255 feet high and 4 feet diameter stack having stack exit velocity of 40 feet per second. Exhaust gases from EU3 are emitted through a 80 feet high and 2.67 feet diameter stack having stack exit velocity of 40.8 feet per second. Exhaust gases from CHP (EU5/EU6) will be emitted through a new 80 feet high and 3 feet diameter stack having stack exit velocity of 89.6 feet per second at maximum firing rate.

2. PREVENTION OF SIGNIFICANT DETERIORATION (PSD) APPLICABILITY

The proposed project at the existing facility will be located in an area which is in either “attainment” or “unclassified” for SO₂, NO₂, CO, Lead (Pb), and total Particulate Matter (PM), which includes PM that does not exceed 10 microns in size (referred to as PM₁₀) and PM that does not exceed 2.5 microns (referred to as PM_{2.5}). Therefore, the proposed project will be located in a PSD area for these pollutants. TRT is an existing, permitted, major source of NO₂ and SO₂. The proposed project would result in an increase of no more than 2.3 tons per year of NO₂ and less than 1 ton per year SO₂, well below the PSD applicability thresholds for NO₂ (40 tons per year) or SO₂ (40 tons per year).

The estimated emissions of SO₂, NO₂, CO, PM, PM₁₀, and H₂SO₄, Pb as well as other miscellaneous PSD pollutants are not expected to rise above PSD significance levels; therefore, PSD review is not required for these pollutants (see Table 2 below).

3. EMISSION UNITS AND POLLUTION CONTROL DEVICES IDENTIFICATION

The following emission units and pollution control devices contained in Table 1 below are subject to and regulated by this Approval:

	Table 1	
Emission Unit	Description of Unit	PCD
EU6	Rentech Custom made, HRSG equipped with a 36 mmBtu/hr Duct Burner	Selective Catalytic Reduction (PCD-3) Oxidation Catalyst (PCD-4)

Table 1 Key:

EU = Emission Unit
PCD = Pollution Control Device
HRSG = Heat Recovery Steam Generator
mmBtu/hr = million British Thermal Units per hour

4. APPLICABLE REQUIREMENTS

A. EMISSION LIMITS AND RESTRICTIONS

The combined emissions from EU5/EU6 shall comply with the emission limits/restrictions as contained in Table 2 below (See Special Conditions Nos. 4 and 5):

Table 2					
EU#	Restrictions/ Operating Parameters	Air Contaminant	Emission Limit ¹		Applicable Regulation And/or Approval Number
			Pounds per hour ²	Tons per 12 month rolling period	
EU5/EU6 ³ (combined emissions)	Natural gas (exclusive fuel of use)	NO _x	0.54	2.3	EU5, 310 CMR 7.26(43); EU6, NE-15-002
		CO	0.32	1.4	
		VOC	0.26	1.1	
		SO ₂	0.13	0.6	
		PM/PM ₁₀ / PM _{2.5} (total, including condensable)	0.51	2.2	
		NH ₃	0.15 (2 ppm@ 15% O ₂)	0.66	
		Opacity	<5%, except 5 to < 10% for ≤2 minutes during any one hour during natural gas operation		
		Smoke	310 CMR 7.06(1)(a)		

Table 2 Notes:

1. For the purposes of calculating emissions from each fuel burned, the heat content value for natural gas shall be 1,000 Btu per cubic foot.
2. Pounds per hour limits shall apply only when EU5 is operated within the 50 percent to 100 percent load range, excluding start-up or shut down periods.
3. EU6 shall only operate when EU5 is operating.

Table 2 Key:

EU# = Emission Unit Number

NO_x = oxides of nitrogen

CO = carbon monoxide

VOC = volatile organic compounds

SO₂ = sulfur dioxidePM/PM₁₀ = particulate matter (10 microns or less)PM_{2.5} = particulate matter (2.5 microns or less)NH₃ = ammoniappm@ 15% O₂ = parts per million at 15 percent oxygen

% = percent

< = less than

≤ = less than or equal to

B. NOISE

Background sounds were monitored at several representative locations that surround the CHP project site. In general, monitoring locations were selected on the basis of where sound impact from the Project was anticipated to be greatest. A review of the existing land use in the vicinity of the project site was conducted to identify the closest and most representative inhabited residential locations. In order to document the amplitude, frequency, and temporal characteristics of environmental sounds at the selected locations, a sound-monitoring program that used intermittent (attended) measurement techniques was conducted. This program was performed on June 18-22, 2015. Additional noise study data was updated on August 11, 2015.

Intermittent (attended) sound monitoring was performed at eight locations representing the property line receptors of the CHP project site. These locations are identified as A, B, C, D, R-1, R-2, R-3, and R-4 in Table A below. The monitors were programmed to record the following hourly A-weighted sound levels: L_{max} , L_{min} , L_{90} , L_{10} percentile sound levels, and the energy average sound level L_{eq} . A-weighted sound level, which is reported in decibels designated as “dBA”, emphasizes the middle frequency sounds to which the human ear is most sensitive and de-emphasizes lower and higher frequency sounds. The L_{90} level represents the sound level exceeded 90 percent of the time and is used by MassDEP for the regulation of noise emissions. The objective of the measurements performed at these locations was to characterize typical late night/early morning sound at the property lines that surround the Project site. The early morning measurements were performed on June 18 -19, 2015 between 11:00 PM and 1:00 AM and daytime measurements were performed on June 18, 2015. Intermittent measurements of the following A-weighted sound level descriptors were recorded for each 10-minute interval: L_{max} , L_{min} , L_{90} , L_{10} , and L_{eq} . Octave band spectrums of the parameters described above were measured.

1. The Applicant shall take necessary precautions to ensure that the facility complies with MassDEP’s noise regulation and policy and that the facility does not cause a condition of air pollution.
2. The Applicant shall perform, at a minimum, the following measures or equivalent alternative measures for noise mitigation:
 - a) EU5 and the Gas Compressor shall be installed in sound-attenuated enclosure.
 - b) The Gas Compressor and EU6 shall be located inside a building with appropriate treatment for building ventilation systems and access openings.
 - c) Silencers shall be installed on the combustion turbine air intake, turbine enclosure ventilation systems, and non-emergency steam vents.
 - d) A reduced-noise lube oil cooler model or equivalent noise mitigation method shall be utilized.
 - e) The fuel gas compressor and drive motor and associated fuel gas equipment shall be installed in a sound-attenuated enclosure.

3. MassDEP Noise Policy 90-001 limits increases over the existing L_{90} background level to 10 dBA. Additionally, "pure tone" sounds, defined as any octave band level that exceeds the levels in adjacent octave bands by 3 dBA or more, are also prohibited. The Applicant, at a minimum, shall ensure that the proposed facility complies with said Policy.
4. The allowable noise levels generated from the operation of the Project by the Applicant are summarized in Table A of this Conditional Plan Approval. Further, based on the noise frequency distribution, no combination of noise sources shall result in a "pure tone condition," as previously defined.

Table A				
Location	Nighttime Baseline Ambient (L_{90}, dBA)¹	Future Maximum Predicted Cogen Plant Noise (Nighttime Levels) (L_{90},dBA)	Total Future Maximum Predicted Plant Generated Noise (Nighttime Levels) (L_{90},dBA)	Predicted Increase over Nighttime Baseline (L_{90},dBA)
A	52	35	52	0
B	48	39	49	1
C	43	37	44	1
D	47	42	48	1
R-1	46	29	46	0
R-2	48	40	49	1
R-3	44	39	45	1
R-4	52	31	52	0

Table A Note:

1. The lowest background sound levels (one hour) observed where the noise level is exceeded 90 percent of the time (L_{90}), which is the level regulated by the MassDEP Noise Policy. Data presented are from short-term manual measurements by the field team on the night of June 18-19, 2015 for all locations except for location B, where the value is from the rooftop long term monitor, which was not accessible by the field team at night. Includes sound from all existing sources.

C. COMPLIANCE DEMONSTRATION

TRT shall comply with the monitoring/testing, record keeping, and reporting requirements as contained in Tables 3, 4, and 5 below:

Table 3	
EU#	Monitoring and Testing Requirements
EU5/EU6	1) TRT shall install, calibrate and maintain the continuous emissions monitoring equipment required pursuant to 40 CFR 60, New Source Performance Standards (NSPS), Subpart KKKK, and Monitoring of Operations for Stationary Gas Turbines, as applicable.
	2) TRT shall conduct compliance testing, within 90 days of the commencement of continuous operation of said units, to demonstrate compliance with the NO _x , CO, VOC, PM _{2.5} , and NH ₃ emission limitations in pounds per hour as listed in Table 2 above. All compliance testing shall be conducted in accordance with the test methods and procedures set forth in 40 CFR 60, Appendix A or the latest test methods recommended by USEPA. All compliance testing shall be witnessed by MassDEP personnel at a mutually agreeable time and date.
	3) TRT shall conduct a noise survey (during daytime and nighttime operation), which is in accordance with MassDEP guidelines, to demonstrate that the noise impacts from the operation of the subject equipment are in compliance with Regulation 310 CMR 7.10 and the Bureau of Waste Prevention's Noise Policy No. 90-001 (copy attached). This survey shall be conducted within 45 days of the commencement of continuous operation of the subject equipment.
	4) EU5/EU6 shall be constructed so as to accommodate the emissions testing requirements as stipulated in 40 CFR Part 60, Appendix A or the latest test methods recommended by USEPA. The two outlet sampling ports (90 degrees apart from each other) for EU5/EU6 must be located at a minimum of one duct diameter upstream and two duct diameters downstream of any flow disturbance.
	5) TRT shall install, operate and maintain a continuous emissions monitoring system (CEMS). This CEMS shall monitor NO _x , CO, NH ₃ and oxygen (as reference gas). The CEMS shall be certified in accordance with 40 CFR 60, Appendix B within 180 days of EU5/EU6 start-up. TRT shall also provide CEMS audit sample points/lines, which will permit the use of audit gas samples to challenge the sample acquisition system and analytical hardware of the CEMS. TRT shall use MassDEP approved equipment for the CEMS equipment. TRT shall comply with the quality assurance and quality control measures as specified in 40 CFR 60, Appendix F. The first CEMS accuracy assessment test shall be a relative accuracy test audit and shall be performed during initial compliance testing, as required by Condition No. 2 above. TRT shall comply with reporting requirements specified in 40 CFR 60, Appendix F. TRT shall maintain on-site or have readily available an adequate supply of spare parts to maintain its CEMS and its air pollution control system.
	6) TRT shall use and maintain its CEMS as "direct-compliance" monitors to measure NO _x , CO, NH ₃ , and oxygen. "Direct-compliance" monitors generate data that legally documents the compliance status of a source. MassDEP will utilize the data generated by the "direct-compliance" monitors for compliance and enforcement purposes.
	7) A quality assurance/quality control (QA/QC) program must be developed for the long-term operation of the CEMS serving EU5/EU6.
	8) EU5/EU6 shall be equipped with a fuel meter and recorder.
	9) TRT shall install and operate continuous sensors and alarm systems to monitor temperatures at the inlet to the SCR/CO oxidation catalyst air pollution control system.

Table 3	
EU#	Monitoring and Testing Requirements
EU5/EU6	<p>10) TRT shall install, calibrate, test and operate a Data Acquisition and Handling System(s) (DAHS) for the CEMS to measure EU5/EU6 and associated air pollution control system operating parameters and the following emissions from the subject project:</p> <ul style="list-style-type: none"> a) Oxygen (O₂) b) Oxides of Nitrogen (NO_x) c) Carbon Monoxide (CO) d) Ammonia (NH₃)

Table 4	
EU#	Record Keeping Requirements
EU5/EU6	<p>11) TRT shall comply with all applicable record keeping requirements of the federal regulation 40 CFR 60, Subpart KKKK, such as written advance notification of start-up, post-notification of actual start-up and calendar quarter excess emissions reports. TRT shall establish and maintain a record keeping system at the TRT Facility. Relevant records shall be maintained such that the year-to-date information is readily available for review by MassDEP personnel. Record keeping shall, at a minimum, include:</p> <ul style="list-style-type: none"> • fuel consumption; • hours of operation; • daily, monthly, and 12-month rolling cumulative emissions of NO_x and CO; and • all other data necessary to demonstrate compliance with the emissions limits contained in Table 2 above. <p>These records shall be maintained at the TRT Facility for five (5) years following the date of the records, and shall be made available to MassDEP personnel upon request.</p> <p>12) TRT shall maintain adequate monthly records to demonstrate that the NO_x, CO, VOC, SO₂, NH₃, and PM/PM₁₀/PM_{2.5} emissions from EU5/EU6 do not exceed the emission limitations specified in this Conditional Plan Approval. At a minimum, the information shall include the amount of fuel used during the month for EU5/EU6, and the actual emissions (i.e., actual fuel times emission rate) of NO_x, CO, VOC, SO₂, NH₃, and PM/PM₁₀/PM_{2.5} for the month as well as the prior 11 months, as well as adequate records to document facility-wide emissions, and CEMS data documenting excess emissions (See attached On-Site Record Keeping Form for the format that is acceptable to MassDEP. An electronic version of this form in Microsoft Excel format can be obtained at http://www.state.ma.us/dep/nero/bwp/nerobwp.htm).</p> <p>13) EU5/EU6 shall record with a fuel meter the amount of fuel combusted.</p>

Table 4	
EU#	Record Keeping Requirements
EU5/EU6	<p>14) TRT shall maintain all records generated by its Data Acquisition and Handling System(s) (DAHS) for the CEMS serving EU5/ EU6, including associated air pollution control system operating parameters and the following emissions from EU5/EU6:</p> <ul style="list-style-type: none"> a) Oxygen (O₂) b) Oxides of Nitrogen (NO_x) c) Carbon Monoxide (CO) d) Ammonia (NH₃)
	<p>15) All periods of excess emissions from EU5/EU6, even if attributable to an emergency/malfunction or start up/shutdown, shall be quantified and included by TRT in the determination of rolling 12-month period emissions and compliance with the rolling 12-month period emission limitations as stated in Table No. 2 of this Plan Approval. (“Excess Emissions” are defined as emissions, which are in excess of the short-term emission limitations as stipulated in Table 2.).</p>
	<p>16) TRT shall keep operating and maintenance logbooks, or similar record keeping systems, for EU5/EU6 on-site. These logbooks, or similar, shall contain the following information:</p> <ul style="list-style-type: none"> a. Hours of operation including start-ups and shutdowns; and b. Monthly records of maintenance activities for EU5/EU6 and associated air pollution control system. <p>These records shall be maintained on-site for a minimum of five (5) years and shall be made available to MassDEP personnel upon request.</p>
Facility-wide	<p>17) TRT shall maintain all necessary information used in the preparation of Source Registration/Emission Statement Forms as required by 310 CMR 7.12.</p>
	<p>18) TRT shall maintain all records or reports required by this Approval on-site for five (5) years. All records shall be made available to representatives of MassDEP or EPA upon request.</p>

Table 5	
EU#	Reporting Requirements
EU5/EU6	<p>19) The results of the conducted noise survey (during daytime and nighttime operation), shall be submitted to this Office, in writing, attention Bureau of Air and Waste, Permit Chief, within 75 days of the commencement of continuous operation of EU5/EU6.</p>
	<p>20) A pre-test protocol, describing the test methods for NO_x, CO, VOC, PM_{2.5}, and NH₃ compliance testing, procedures for NO_x, CO and VOC optimization/ minimization, sampling point locations, sampling equipment, sampling and analytical procedures, and the operating conditions for the required testing must be submitted to this Office, attention Bureau of Air and Waste Prevention, Permit Chief, for review and MassDEP approval at least thirty (30) days prior to the commencement of compliance testing at the facility.</p>

Table 5	
EU#	Reporting Requirements
EU5/EU6	21) The final compliance testing results report must be submitted to this Office, attention Bureau of Air and Waste (BAW), Permit Chief, within 60 days of completion of said testing.
	22) TRT shall comply with all applicable reporting requirements of the federal regulation 40 CFR 60, Subpart KKKK, such as written advance notification of start-up, post-notification of actual start-up.
	23) A quality assurance/quality control (QA/QC) program must be developed for the long-term operation of the CEMS servicing EU5/EU6. The QA/QC program must be submitted in writing for review and approval by MassDEP at least 30 days prior to commencement of facility operation. Any subsequent changes to the program shall be approved by MassDEP.
	24) The preliminary Standard Operating and Maintenance Procedures (SOMP) shall be submitted to this Office, BAW Permit Chief within 30 days of completion of construction of the subject equipment.
	25) TRT shall submit the Final SOMP concerning EU5/EU6 to this Office, BAW Permit Chief, within 60 days of completion of the required initial compliance testing of EU5/EU6. The Final SOMP must include standard operating and maintenance procedures for the subject equipment.
	26) TRT shall submit any subsequent revision(s) made to the Final SOMP concerning EU5/EU6, to this Office, BAW Permit Chief, within 15 days of said revision(s).
	27) MassDEP's NERO, BAW Compliance and Enforcement Chief, must be notified by telephone (978-694-3200), fax at (978) 694-3499) or email at nero.air@state.ma.us, as soon as possible, but no later than one business day, and subsequently in writing within seven days, after the occurrence of any upsets or malfunctions to EU5/EU6, which result in an excess emission to the air and/or a condition of air pollution. The written communication shall describe the duration of and reason for the exceedance, and the remedial action taken or proposal to prevent future exceedances.
EU6	28) TRT shall notify this Office in writing, BAW Permit Chief, when the installation of EU6 is complete and it is deemed ready for operation, within 14 days thereof.
Facility-wide	29) TRT shall accurately report to MassDEP in accordance with 310 CMR 7.12, all information as required by the Source Registration/Emission Statement Form. The facility shall note any minor changes, which did not require Plan Approval (under 310 CMR 7.02, 7.03, etc.) therein.

5. SPECIAL CONDITIONS

1. A copy of this Approval letter and the Standard Operating and Maintenance Procedure for the subject equipment shall be affixed at or adjacent to the subject equipment.
2. TRT shall operate PCD-3 and PCD-4 whenever EU5/EU6 is operated, including start-up and shutdown, except that PCD-3 shall be placed in operation only after the exhaust gas temperature reaches approximately 550 degrees F.
3. The short-term emission limitations established in Table 2 shall apply only when EU5 is operated within the 50 percent to 100 percent load range, excluding start-up

or shut down periods. Compliance with these emission limitations shall be determined based on one-hour averages.

4. TRT shall not operate EU5 at power generating loads below 50 percent of combustion turbine rated capacity or power generating loads exceeding 100 percent of combustion turbine rated capacity, excluding start-up or shutdown periods. EU5 start-ups and shutdowns shall be per turbine manufacturers' specifications, but shall not exceed two hours in duration for each episode.
5. EU5 and EU6 must comply with all applicable sections of 40 CFR Part 60 – New Source Performance Standards – Subpart KKKK (Gas Turbines).
6. Any stack exit rain protection device shall not impede the exhaust gas flow from the exhaust stack of EU6.
7. TRT shall comply with all requirements of Regulation 310 CMR 7.26(43) for EU5.
8. Natural gas shall be the only fuel of use in EU5/EU6.
9. Any net NO_x emissions increase occurring over a period of five consecutive calendar years which equates to 25 or more tons of NO_x (including the 2.3 tons of allowable NO_x emissions generated from the subject equipment) shall become subject to Nonattainment Review, as per the requirements of 310 CMR 7.00: Appendix A.
10. TRT shall operate the subject equipment consistent with the Final SOMP and the conditions/parameters established during the compliance test program.

6. GENERAL CONDITIONS

1. Should any nuisance condition(s) be generated by the operation of the above-described equipment, then appropriate steps shall immediately be taken by TRT to abate said nuisance condition(s).
2. Should asbestos remediation/removal be required as a result of the approved construction, reconstruction, or alteration of this facility, removal/remediation of asbestos shall be done in accordance with Regulation 310 CMR 7.15 in its entirety and 310 CMR 4.00.
3. TRT shall allow MassDEP personnel access to the subject facility site, buildings, and all pertinent records during business hours for the purpose of making inspections and surveys, collecting samples, obtaining data, and reviewing records.
4. Please be advised that this Approval does not negate the responsibility of TRT to comply with this or any other applicable federal, state, or local regulations now or in

the future. Nor does this Approval imply compliance with this or any other applicable federal, state, or local regulations now or in the future.

5. This Approval may be suspended, modified, or revoked by the MassDEP if, at any time, MassDEP determines that TRT is violating any condition or part of this Approval.
6. MassDEP has determined that the filing of an Environmental Notification Form (ENF) with the Secretary of Energy & Environmental Affairs, for air quality purposes, was not required prior to this action by MassDEP. Notwithstanding this determination, the Massachusetts Environmental Policy Act (MEPA) and Regulation 301 CMR 11.00, Section 11.04, provide certain "Fail-Safe Provisions" which allow the Secretary to require the filing of an ENF and/or an Environmental Impact Report at a later time.
7. MassDEP may revoke this Conditional Plan Approval if the construction work has not begun within two years from the date of issuance of this Approval, or if the construction work is suspended for one year or more.
8. This Approval consists of the Application materials and this Approval letter. If conflicting information is found between these two documents, then the requirements of the Approval letter shall take precedence over the documentation in the application materials.
9. Failure to comply with any of the above-described conditions will constitute a violation of the "Regulations", and can result in the revocation of the Approval granted herein.

This Plan Approval is an action of MassDEP. If you are aggrieved by this action, you may request an adjudicatory hearing. A request for a hearing must be made in writing and postmarked within twenty-one (21) days of the date you received this Plan Approval. Under 310 CMR 1.01(6) (b), the request must state clearly and concisely the facts which are the grounds for the request, and the relief sought. Additionally, the request must state why the Plan Approval is not consistent with applicable laws and regulations.

The hearing request along with a valid check payable to the Commonwealth of Massachusetts in the amount of one hundred dollars (\$100.00) must be mailed to:

Commonwealth of Massachusetts
Department of Environmental Protection
P.O. Box 4062
Boston, MA 02211

The request will be dismissed if the filing fee is not paid, unless the appellant is exempt or granted a waiver as described below.

The filing fee is not required if the appellant is a city or town (or municipal agency), county, or district of the Commonwealth of Massachusetts, or a municipal housing authority.

MassDEP may waive the adjudicatory hearing filing fee for a person who shows that paying the fee will create an undue financial hardship. A person seeking a waiver must file, together with the hearing request as provided above, an affidavit setting forth the facts believed to support the claim of undue financial hardship.

Should you have any questions concerning this matter, please do not hesitate to contact Mr. Dhiraj B. Desai by telephone at 978-694-3282, or in writing at the letterhead address.

Sincerely,

This final document copy is being provided to you electronically by the
Department of Environmental Protection. A signed copy of this document
is on file at the DEP office listed on the letterhead.

Dhiraj B. Desai
Environmental Engineer

This final document copy is being provided to you electronically by the
Department of Environmental Protection. A signed copy of this document
is on file at the DEP office listed on the letterhead.

Susan P. Ruch
Acting Permit Chief and Deputy
Regional Director
Bureau of Air and Waste

cc: Board of Health, 440 East Squantum Street, Quincy, MA 02171
Fire Headquarters, 40 Quincy Avenue, Quincy, MA 02169
MassDEP/Boston (e-copy) - Y. Tian
MassDEP/NERO (e-copy) - M. Bolis, E. Braczyk
MassDEP/NERO (Hard Copy) - M. Persky, D. Desai
ERM, One Beacon Street, 5th Floor, Boston, MA 02108 ATTN: Mr. Robert Fraser